

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**IN RE JOHNSON & JOHNSON TALCUM  
POWDER PRODUCTS MARKETING, SALES  
PRACTICES, AND PRODUCTS LIABILITY  
LITIGATION**

**CHRIS RAPE**

**Plaintiff,**

**v.**

**JOHNSON & JOHNSON, and JOHNSON &  
JOHNSON CONSUMER INC.**

**Defendants.**

**MDL NO. 16-2738 (FLW) (LHG)  
JUDGE FREDA L. WOLFSON  
MAG. JUDGE LOIS H.  
GOODMAN**

**COMPLAINT AND JURY  
DEMAND**

Civil Action No: 3:20-cv-14725

**DIRECT FILED ACTION**

**NOTICE OF FILING**

Notice is hereby given pursuant to the Court's Case Management Orders that the Short Form Complaint and Jury Demand, in the above referenced matter, was filed on October 20, 2020 on behalf of Plaintiff Chris Rape.

Dated: October 26, 2020

Respectfully Submitted,

By: /s/ T. Christopher Pinedo

T. Christopher Pinedo  
HILLIARD MARTINEZ GONZALES LLP  
719 South Shoreline Boulevard  
Corpus Christi, Texas 78401  
Phone: 361.882.1612  
Fax: 361.882.3015  
[cpinedo@hmglawfirm.com](mailto:cpinedo@hmglawfirm.com)

Attorneys for Plaintiff Chris Rape

**CERTIFICATE OF SERVICE**

I hereby certify that on October 26, 2020, I electronically filed the forgoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of records.

**HILLIARD MARTINEZ GONZALES, LLP**

/s/ T. Christopher Pinedo